

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON WAVE 2 CASES LISTED IN  
PLAINTIFFS' EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING  
E. STANTON SHOEMAKER, M.D. FOR WAVE 2**

Defendants Ethicon, Inc. and Johnson & Johnson (Ethicon) hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of E. Stanton Shoemaker, M.D. for Ethicon Wave 1, Dkt. 2239. Ethicon respectfully requests that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 5, 2016

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

/s/ Rita A. Maimbourg

Rita A. Maimbourg  
TUCKER ELLIS LLP  
950 Main Avenue, Suite 1100  
Cleveland, OH 44113-7213  
Tel: 216.592.5000  
Fax: 216.592.5002  
[rita.maimbourg@tuckerellis.com](mailto:rita.maimbourg@tuckerellis.com)

/s/ David B. Thomas

---

David B. Thomas (W.Va. Bar #3731)  
THOMAS COMBS & SPANN PLLC  
300 Summers St.  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
Tel: 304.414.1807  
[dthomas@tcspllc.com](mailto:dthomas@tcspllc.com)

/s/ Christy D. Jones

---

Christy D. Jones  
BUTLER SNOW LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
Tel: 601.985.4523  
[christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com)

**CERTIFICATE OF SERVICE**

I certify that on August 5, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ Rita A. Maimbourg

Rita A. Maimbourg

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100

Cleveland, OH 44113-7213

Tel: 216.592.5000

Fax: 216.592.5002

[rita.maimbourg@tuckerellis.com](mailto:rita.maimbourg@tuckerellis.com)